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REGULATORY AUTH.

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EXECUTIVE SECRETARY

January 29, 2001

**By Hand**

David Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

Re: Petition for Arbitration of the Interconnection Agreement Between AT&T  
Communications of the South Central States, Inc., TCG MidSouth, Inc. and BellSouth  
Telecommunications, Inc.) Pursuant to the 47 U.S.C. § 252



Docket No. 00-00079

Dear Mr. Waddell:

Enclosed for filing in the above-captioned proceeding are an original and thirteen copies of  
AT&T's Motion to Compel. A copy is being provided to counsel for BellSouth by courier and  
electronic mail.

If you have questions, please call me.

Sincerely,

  
Jim Lamoureux 

Encls.

cc: Douglas Lackey  
Bennett Ross

**BEFORE THE  
TENNESSEE REGULATORY AUTHORITY**

*Re:* Petition for Arbitration of the Interconnection )  
Agreement Between AT&T Communications of the )  
South Central States, Inc., TCG MidSouth, Inc. and )      Docket No. 00-00079  
BellSouth Telecommunications, Inc. Pursuant      )  
to the 47 U.S.C. § 252      )

**AT&T'S MOTION TO COMPEL**

AT&T Communications of the South Central States, Inc. ("AT&T"), by and through its undersigned counsel, hereby moves for the entry of an Order compelling BellSouth Telecommunications, Inc. ("BellSouth") to respond to interrogatory requests and requests for production of documents on an expedited basis, to allow AT&T a reasonable amount of time to review the responses and documents for purposes of preparation for its pending arbitration hearing, to be scheduled by the Authority. In support of this Motion, AT&T states as follows:

1.      On November 27, 2000, AT&T filed its first set of interrogatories and request for production of documents on BellSouth. BellSouth filed objections to Interrogatory Nos. 25, 26, 27, 28, 32, 33, 35 and Request for Production No. 15 on December 1, 2000.

2.      AT&T's discovery requests are reasonably calculated to lead to the discovery of admissible evidence concerning the issues in this proceeding. AT&T is willing to promptly execute a Non-Disclosure Agreement for any information that it has requested that is viewed by BellSouth.

3. The parties have established a list of specific issues to be arbitrated. As explained below, AT&T's discovery requests are well within the scope of and reasonably calculated to lead to admissible evidence concerning these issues.

4. Interrogatory No. 25 states as follows:

25: Please state whether BellSouth has a time frame for issuing clarifications, jeopardy notices, and rejections from the time of the receipt of the LSR. If yes, please provide the time frame(s) and a detailed explanation for these time frames.

These interrogatories are relevant to Issue 18(b) and (c), which state as follows:

Issue 18. What should be the resolution of the following OSS issues currently pending in the change control process but not yet provided? (OSS, Attachment 7, Exhibit A)

(b) ability to submit orders electronically for all services and elements?  
(c) electronic processing after electronic ordering, without subsequent manual processing by BellSouth personnel?

Clarifications, jeopardy notices and rejections are all status notices related to the ordering and provisioning processes addressed under the sub-issues 18(b) and (c). Although the lack of electronic ordering and processing capabilities result in delay, increased error, increased cost, and an impaired ability to compete, BellSouth claims in its testimony that it is providing non-discriminatory access for CLECs to its OSS functions, and that "non-discriminatory access does not require that all LSRs be submitted electronically and flow through BellSouth's systems without human intervention." The information requested relates to the timeliness of BellSouth's status responses for fully mechanized, partially mechanized and manual processing of status messages, and is required to evaluate

BellSouth's claim, demonstrate that AT&T's business needs are not being met, and support AT&T's requested resolution of this issue.

5. Interrogatories No. 26, 27 and 42 state as follows:

26: Describe in detail the methodology utilized by BellSouth to calculate the "Percent Flow Through Service Requests Report" and "LNP Percent Flowthrough Service Requests Report" for service requests submitted on or after September 1, 2000, including a description of any changes to that methodology that have been implemented since that date. Include descriptions for all sub-sections of each report (Summary, Detail, Residence Detail, Business Detail, UNE Detail, Flowthrough Error Analysis, LNP Summary, and LNP Aggregate Detail).

27: List, identify and describe all products or services contained in BellSouth Flowthrough Reports under the following categories:

- a) LNP;
- b) UNE;
- c) Business; and
- d) Residence

42: Please describe in detail the methodology utilized by BellSouth to calculate the "Percent Flow Through Service Requests" for BellSouth's retail operations. Provide the methodology for requests placed using the Regional Negotiation System (RNS) and using the Regional Ordering System (ROS).

These interrogatories are relevant to Issue 18(b) and (c), which state as follows:

Issue 18. What should be the resolution of the following OSS issues currently pending in the change control process but not yet provided? (OSS, Attachment 7, Exhibit A)

- (b) ability to submit orders electronically for all services and elements?
- (c) electronic processing after electronic ordering, without subsequent manual processing by BellSouth personnel?

This interrogatory is relevant to AT&T's request for OSS functionality equivalent to that available to BellSouth. Flow-through is a key capability available to BellSouth's operations for all types of services, elements and features, but available to CLECs only for selected services, elements and features. AT&T is entitled to investigate flow-through for BellSouth orders as well as CLEC orders, including BellSouth's reporting of flow-through, in order to demonstrate that BellSouth does not currently provide equivalent functionality to AT&T.

In his testimony, Mr. Pate claims that BellSouth "is providing non-discriminatory access for CLECs to its OSS functions. Non-discriminatory access does not require that all LSRs be submitted electronically and flow through BellSouth's systems without human intervention." (Pate direct testimony at page 88) BellSouth also testifies that providing flow-through for many CLEC LSRs is complex, too costly, or required by unique circumstances. BellSouth's methodology in the reporting of data associated with the processing of electronically submitted CLEC LSRs has changed significantly over time and such changes have often not been fully documented. For example, the September 2000 Reports included a new and unexplained category "Pending Supps". An accurate understanding of the underlying process and the data reporting methodology being applied to that process is required to evaluate BellSouth's claim, demonstrate that AT&T's business needs are not being met, and support AT&T's requested functionality using operational data.

6. Interrogatories No. 32 and 33 state as follows:

32. For each month beginning May 2000 through October 2000, across all nine BellSouth states and for Tennessee specifically, provide the total

number of CLEC trouble reports received by BellSouth by interface/process:

CLEC Trouble Volumes – Nine States

Month	TAFI	ECTA	WFA	LMOS	Total

CLEC Trouble Volumes – Tennessee

Month	TAFI	ECTA	WFA	LMOS	Total

33: For each month beginning May 2000 through October 2000, across all nine BellSouth states and for Tennessee specifically, provide the total number of BellSouth retail trouble reports received by BellSouth by interface/process:

BellSouth Trouble Volumes – Nine States

Month	TAFI	WFA	LMOS	Total

BellSouth Trouble Volumes – Tennessee

Month	TAFI	WFA	LMOS	Total

These interrogatories are relevant to Issue 19, which states as follows:

Issue 19. Should BellSouth provide AT&T with the ability to access, via EBI/ECTA, the full functionality available to BellSouth from TAFI and WFA? (OSS, Attachment 7)

In this issue, AT&T has requested a nondiscriminatory, full function, integrateable maintenance and repair interface. Mr. Pate has testified that BellSouth "currently provides CLECs with non-discriminatory access to its maintenance and repair OSS functions through the TAFI and ECTA Gateway, and therefore meets its obligations

under the Act and the FCC Rules." AT&T's request seeks operational data not currently provided in BellSouth's standard reports that it requires in order to evaluate BellSouth's claim, compare trouble reporting and handling for BellSouth and CLECs, demonstrate that AT&T's business needs are not being met, and support AT&T's requested resolution of Issue 19.

7. Interrogatories No. 28 and 35 state as follows:

28: For each month beginning January 2000 through October 2000, across all nine BellSouth states and for Tennessee specifically, identify the volume of BellSouth employee input service requests that failed to be accepted by SOCS as valid service orders and thus did not reach assignable order (AO) status.

**Month / Year**  
**Service Requests for Local Exchange Service Failing to Reach AO Status**

<b>Product Group</b>	<b>Business</b>	<b>Residence</b>	<b>Total</b>
<b>Interface</b>			
RNS			
DOE			
SONGS			
ROS			
Total			

35: For each month beginning May 2000 through October 2000, across all nine BellSouth states and for Tennessee specifically, identify the volume of BellSouth service requests for retail local exchange services and the volume of service orders (SOs) subsequently issued.

**Month / Year**  
**Service Requests for Local Exchange Service and Service Order Volume**

<b>Product</b>	<b>Business</b>	<b>Residence</b>	<b>Total</b>
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<b>Group</b>						
	Requests	SO	Requests	SO	Requests	SO
<b>Interface</b>						
RNS						
DOE						
SONGS						
ROS						
Total						

These interrogatories are relevant to Issue 18(b) and (c), which state as follows:

Issue 18. What should be the resolution of the following OSS issues currently pending in the change control process but not yet provided? (OSS, Attachment 7, Exhibit A)

(b) ability to submit orders electronically for all services and elements?  
(c) electronic processing after electronic ordering, without subsequent manual processing by BellSouth personnel?

This information is relevant to AT&T's request for OSS functionality equivalent to that available to BellSouth. The standard of "nondiscrimination" necessarily involves an investigation of the level of access and service BellSouth provides to its self. AT&T therefore is entitled to investigate and understand all methods by which BellSouth personnel access and interact with BellSouth's OSS. Also, AT&T is entitled to investigate and understand the level of electronic processing experienced by BellSouth's service requests, and to review the relationship between flowthrough experienced by BellSouth and the number of orders that must be resubmitted. Finally, AT&T is entitled to investigate BellSouth's LCSC operations in order to understand all aspects of BellSouth's manual processing of CLEC orders and to compare those operations with BellSouth's manual processing of its own orders.



As stated above, Mr. Pate claims that BellSouth "is providing non-discriminatory access for CLECs to its OSS functions. Non-discriminatory access does not require that all LSRs be submitted electronically and flow through BellSouth's systems without human intervention." Flow-through is a key capability available to BellSouth's operations for all types of services, elements and features, but available to CLECs only for selected services, elements and features. In its testimony, BellSouth also describes how its internal systems RNS and ROS are used to edit employee input, generate request formats readable by SOCS and transmit those formats to SOCS for acceptance. Reaching AO status in SOCS is the signal that the input was acceptable. The data requested here (the number of initiated service requests and the number of requests that failed to reach AO status) is required to evaluate BellSouth's claim, demonstrate that AT&T's business needs are not being met, and support AT&T's requested resolutions. Both numbers are required in the calculation of BellSouth's retail flow through, which is reported monthly.

8. Request for Production No. 15 states as follows:

15: Produce any and all documents, including, but not limited to, all reports, underlying work papers and guidelines that describe or from which one can calculate the percentage of orders for BellSouth's retail business customers that flowed through BellSouth's legacy systems, without human intervention, after input to ROS by a BellSouth employee for each month from May 2000 through October 2000 inclusive.

This request is relevant to Issue 18(b) and (c), which state as follows:

Issue 18. What should be the resolution of the following OSS issues currently pending in the change control process but not yet provided?  
(OSS, Attachment 7, Exhibit A)


(b) ability to submit orders electronically for all services and elements?  
(c) electronic processing after electronic ordering, without subsequent manual processing by BellSouth personnel?

This information is relevant to AT&T's request for OSS functionality equivalent to that available to BellSouth. ROS is BellSouth's retail sales and marketing system. ROS's ability to process service requests is the benchmark against which the capabilities being offered to CLECs must be measured, including flowthrough. An accurate understanding of the underlying process and the data reporting methodology being applied to that process is required to evaluate BellSouth's claim that it is providing nondiscriminatory OSS to CLECs, demonstrate that AT&T's business needs are not being met, and support AT&T's requested resolution of this issue using operational data.

9. Interrogatories No. 32, 33, 82, 35, and Request for Production No. 15 request information through October, 2000. At the time AT&T propounded its discovery, BellSouth could have provided responses through October, 2000. As of January 15, 2000, however, BellSouth will be able to provide responses through December, 2000. Accordingly, AT&T asks that BellSouth be ordered to provide responses for these interrogatories through December, 2000.

WHEREFORE, AT&T respectfully requests that the Commission enter an order granting this motion and compelling BellSouth to respond fully to AT&T's Interrogatories No. 25, 26, 27, 28, 32, 33, 35, 42 and Request for Production No. 15 on an expedited basis to allow AT&T a reasonable amount of its pending arbitration hearing, to be scheduled by the Authority.

Respectfully filed this 29th day of January, 2001.

A handwritten signature in cursive script, reading "Jim Lamoureux", followed by a circled "e" or "ll" symbol.

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